

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

IN RE:	
JAMES HENRY CALL TERRIE MACE CALL  Debtors	Case No. 13-30686-KRH (Chapter 13)
CITIFINANCIAL, INC. D/B/A CITIFINANCIAL, INC. (WV)  Movant  v.  JAMES HENRY CALL TERRIE MACE CALL and SUZANNE E. WADE, Trustee.  Respondents	Ref. Dkt. #82

**NOTICE OF NON-PAYMENT**

Now comes CitiFinancial, Inc. d/b/a CitiFinancial, Inc. (WV) (“CitiFinancial”), by undersigned counsel, and hereby gives notice of the following:

1. A Consent Order Modifying Automatic Stay (“Consent Order”) was entered by this Court on August 17, 2015.
2. CitiFinancial has complied with the terms of the terms of the entered Consent Order.
3. Pursuant to the terms of the Consent Order, a Notice of Default was served and filed on December 2, 2015.

Kathryn Smits, Bar #77337  
ksmits@atlanticlawgrp.com  
Hugh J. Green, Bar #86687  
hgreen@atlanticlawgrp.com  
Atlantic Law Group, LLC  
PO Box 2548  
Leesburg, Virginia 20177  
(703) 777-7101

4. That neither the Debtor nor the Trustee have complied with the terms of the Consent Order by failing to take any of the following actions since the mailing of the Notice of Default:
  - a. cure the default;
  - b. file an objection with the Court stating that no default exists; or
  - c. file an objection with the Court stating any other reason why an Order granting relief from the automatic stay should not be entered; and
5. That pursuant to the terms of the Consent Order, CitiFinancial considers the automatic stay terminated with regards to the collateral referenced in the Consent Order upon entry of the Order Terminating Stay.

Respectfully submitted,

/s/ Kathryn Smits  
Kathryn Smits, Bar #77337  
ksmits@atlanticlawgrp.com  
Hugh J. Green, Bar #86687  
hgreen@atlanticlawgrp.com  
Atlantic Law Group, LLC  
P.O. Box 2548  
Leesburg, Virginia 20177  
(703) 777-7101

**CERTIFICATION OF SERVICE**

I HEREBY CERTIFY that copies of the foregoing Notice of Non-Payment were mailed by first class mail, postage-paid, and electronically where applicable, this 19 day of January, 2016 to the following parties:

James Henry Call  
Terrie Mace Call  
10803 Timber Run Road  
Chesterfield, VA 23832  
Debtors

Richard James Oulton, Esquire  
America Law Group, Inc.  
8501 Mayland Dr.  
Suite 106  
Henrico, VA 23294  
Attorney for the Debtors

Suzanne E. Wade, Trustee  
P.O. Box 1780  
Richmond, VA 23218-1780

/s/ Kathryn Smits  
Kathryn Smits, Esquire  
Hugh J. Green, Esquire